

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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GUERLINE BENJAMIN,

2:24-cv-07399 (LGD)

Plaintiff,

v.

**DECLARATION OF
VICTORIA
HOVSEPYAN**

COSTCO WHOLESALE CORPORATION,

Defendant.

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I, Victoria Hovsepyan, declare under penalty of perjury that the following facts and statements are true and correct:

1. I am an attorney admitted to practice in the State of New York. I was admitted *pro hac vice* in the U.S.D.C. for the Eastern District of New York to represent the plaintiff in this matter.

2. I respectfully submit this Declaration in response to the Court's Order dated February 28, 2025.

3. As previously declared, I have taken two CLE classes focusing on AI and the practice of law. Specifically, on February 20, 2025, I took a CLE class entitled "Legal Use Cases for Generative AI & Their Ethical Implications," provided by Lawline. This class provided 1 CLE credit in "professional practice." I paid \$59.00 for this course.

4. On February 21, 2025, I took a CLE class entitled "Artificial Intelligence & Its Impact on the Practice of Law." This CLE was provided by New York State Bar Association Continuing Legal Education Department, for 1.0 CLE credit in "cybersecurity, privacy and data protection." On February 20, 2025, I paid \$395.40 to renew my membership in the New York State Bar Association ("NYSBA"), which has a new program for members, providing many free CLE courses. As a member, there was no charge for this particular program.

5. Additionally, on March 11, 2025, I took 2 CLE classes provided by National Academy of Continuing Legal Education. The first is entitled “Federal Civil Procedure: Practicing Tips for Federal Litigation.” This class provided 1 CLE credit in “professional practice.” The second is entitled “Bias in the Legal Profession.” This class provided 1 CLE credit in “diversity, inclusion & elimination of bias.” I paid \$99.00 for 3 CLE credits from this provider and still have 1 remaining credit left that I will use for a future CLE.

6. I also registered for the following upcoming CLE classes:

(A) “Federal Court Practice 101: An Introduction to the Nuts & Bolts of Federal Civil Practice” by New York City Bar Association on April 28, 2025. This course provides 3 CLE credits in “skills;” the cost was \$249.00 (for non-members):

(B) “Legal Writing With Lebovits 2025,” sponsored by the New York State Bar Association, on April 23, 2025, providing 3.0 credits (.5 in ethics and professionalism and 2.5 in skills). The cost is free for NYSBA members.

(C) “Litigating with GenAI in New York State & Federal Courts: What You Need to Know in 2025,” sponsored by the NYSBA, on April 30, 2025, providing 1.0 CLE credit in cybersecurity, a required CLE category in New York. The cost is free for NYSBA members.

(D) “Starting a Solo Practice in New York 2025- Part II,” sponsored by the NYSBA, on June 3, 2025, providing 2.5 credits in ethics and professionalism and 2.0 credits in law practice management. The cost is free for NYSBA members.

Having reviewed this Declaration, I declare, under penalty of perjury that the foregoing is true and correct.

Executed on March 12, 2025


VICTORIA HOVSEPYAN